referred to as "the Manghane Plaintiffs"); Defendants COUNTY OF SAN 1 2 BERNARDINO and SHERIFF SHANNON D. DICUS (hereinafter collectively 3 referred to as "the County Defendants"); and Defendant DESERT VALLEY 4 HOSPITAL, LLC dba DESERT VALLEY HOSPITAL (hereinafter referred to as 5 "Desert Valley Hospital"), through their respective counsel of record, voluntarily 6 and with full knowledge and understanding of the provisions stated herein, agree 7 to the following: 8 WHEREAS, the Manghane Plaintiffs filed their Complaint on May 29, 9 2025, upon the County Defendants and Desert Valley Hospital; 10 WHEREAS, also on May 29, 2025, Plaintiffs AARON JAMES, by and 11 through his successors-in-interest, Arthur James and Stacey M. Abbot; ARTHUR 12 JAMES; and STACEY M. ABBOT (hereinafter collectively referred to as "the 13 James Plaintiffs") filed their Second Amended Complaint in their related action, styled as ARTHUR JAMES, and STACEY M. ABBOT as parents of, and 14 15 successors in interest to, AARON JAMES, decedent; Plaintiffs, vs. COUNTY OF 16 SAN BERNARDINO, a municipal entity; Sheriff SHANNON D. DICUS, in his individual, and official capacities; DESERT VALLEY HOSPITAL, LLC, a 17 18 Delaware Limited Liability Company; DOES 1-20, inclusive. Defendants., Case 19 No. 5:25-cv-00140-WLH-SHK; and 20 WHEREAS, as part of the meet and confer discussions regarding 21 responsive pleading and/or motions to dismiss, the Manghane Plaintiffs', the 22 County Defendants, and Desert Valley Hospital discussed and proposed the

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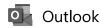
consolidation of these related cases;

Document 18

Filed 06/19/25

Page 4 of 10 Page ID

Case 5:25-cv-01107-JGB-DTB



Re: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

From Marcel Sincich <msincich@galipolaw.com>

Date Thu 6/19/2025 2:23 PM

To Joseph M. Lorant <jml@giolawgroup.com>; Shannon Gustafson <sgustafson@lynberg.com>

Cc Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Alejandro Monguia <amonguia@galipolaw.com>; Kristy K. Shimotani <kks@giolawgroup.com>; Stefany Anderson <sanderson@galipolaw.com>

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Hi Joseph,

Thank you for putting this together. You have my permission to file with my e-signature.

To reiterate as we discussed, I think it makes the most since to get this extension in so that we can potentially consolidate the cases (get in the right court), then figure out the right parties and then any issues with the claims substantively.

I look forward to speaking with you all soon. Thanks.

Very Respectfully,

Marcel F. Sincich, Esq.

Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: msincich@galipolaw.com

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From: Joseph M. Lorant < jml@giolawgroup.com>

Sent: Thursday, June 19, 2025 14:04

To: Marcel Sincich <msincich@galipolaw.com>; Shannon Gustafson <sgustafson@lynberg.com>

Cc: Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence

<gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

Subject: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

Counsels:

After discussing yesterday with Plaintiffs' counsel for this case, attached please find the proposed stipulation and separate order to continue the defendants' responsive pleadings in this case by thirty days so that there may be time to consider consolidation of cases.

Best regards,

Joseph M. Lorant



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RE: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

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To Joseph M. Lorant <jml@giolawgroup.com>; Email: <msincich@galipolaw.com>

Cc Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

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You have my permission to sign and file.

Thanks

Shannon L. Gustafson Shareholder Direct: (714) 352-3547



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Sent: Thursday, June 19, 2025 2:05 PM

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Cc: Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence

<gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

Subject: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

Importance: High

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Counsels:

After discussing yesterday with Plaintiffs' counsel for this case, attached please find the proposed stipulation and separate order to continue the defendants' responsive pleadings in this case by thirty days so that there may be time to consider consolidation of cases.

Best regards,

Joseph M. Lorant



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PROOF OF SERVICE

I am employed in the county of Orange, State of California. I am over the age of eighteen and not a party to the within entitled action; my business address is Six Pointe Drive, Suite 520 Brea, California 92821.

On June 19, 2025, I served the foregoing document(s) described as, STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS as follows:

See below service list

- BY U.S. MAIL: I am "readily familiar" with the business practice for collection and 11 ()
- processing of correspondence for mailing with the United States Postal Service. Under that practice the envelope was sealed and placed for collection and mailing with the
- 14 United States Postal Service on that same day with postage thereon fully prepaid at Brea,
- California following ordinary business practices.
 - BY FEDERAL EXPRESS OVERNIGHT: I placed said envelope(s) for collection and overnight delivery at a regularly utilized drop box of the overnight delivery carrier.
 - (XX) BY ELECTRONIC SERVICE: I caused the document(s) to be sent from kks@giolawgroup.com to the person(s) at the electronic notification addresses indicated on the service list.
 - Executed on June 19, 2025, at Brea, California.
 - STATE: I declare under penalty of perjury under the laws of the State of California that (XX)the foregoing is true and correct.

Arthur James, et. al. v. County of San Bernardino, et. al.

Case No.: 5:25-cv-01107

Page 1 of 2

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Case 5:25-cv-01107-JGB-DTB Document 18

Filed 06/19/25 Page 10 of 10 Page ID